

JUDGE S. S. S.

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA

NATHAN CHARLES GRIGGS)
)
) Plaintiff)
)
) VS.)
)
) BRIAN FISHER ET AL,)
) (JUDGE CALDWELL)

FILED
HARRISBURG, PA

SEP 25 2002

MARY E. D'ANDREA, CLERK
Per SJS
Deputy Clerk

**JOINT MOTION FOR ENLARGEMENT OF TIME AND
TO ADVANCE THE CASE MANAGEMENT SCHEDULE ACCORDINGLY**

- 1.) On or about October 12, 2002 discovery ends in the above captioned matter.
- 2.) Plaintiff has been working on eliminating some of the defendants as suggested by the Court and has done so within the past week.
- 3.) Counsel has deposed the defendants and the defendants still have to depose the plaintiff and other witnesses as well.
- 4.) Counsel are requesting an enlargement of time until December 12, 2002 to finish discovery in this matter.
- 5.) In addition, document discovery is not complete and counsel agreed it must be completed before dispositive motions can be addressed.

WHEREFORE the Court is respectfully requested to grant a Joint Motion for Enlargement of Time until December 12, 2002 to conclude with discovery in this matter and to advance the Case Management Plan accordingly.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Don Bailey", is written over a horizontal line.

BAILEY STRETTON & OSTROWSKI
Don Bailey Esq.
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Harrisburg, Pa 17110
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CERTIFICATE OF SERVICE

I, Don Bailey do hereby certify that on this 25th **OF SEPTEMBER 2002** I served a true and correct copy of the JOINT MOTION FOR ENLARGEMENT OF TIME upon the attorneys below by First class-postage prepaid mail:

JAY BRADERMAN ESQUIRE
126 LOCUST STREET
HARRISBURG, PA 17108


Don Bailey Esquire